



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX
75 Hawthorne Street
San Francisco, CA 94105

DEC 17 2018

CERTIFIED MAIL NO. 7015 0640 0001 1122 2158
RETURN RECEIPT REQUESTED

Pati Jennings
J Mascot Auto Parts
PO Box 1239
Pago Pago, AS 96799

Dear Mr. Jennings:

On September 26, 2018 representatives of the U.S. Environmental Protection Agency (USEPA) and the American Samoa Environmental Protection Agency (ASEPA) conducted an unannounced compliance evaluation inspection (CEI) of the J Mascot Auto Parts facility in American Samoa. The purpose of the inspection was to determine J Mascot Auto Part's compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, and the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279.

A copy of the inspection report is enclosed for your information and response. The report describes conditions at the facility at the time of the inspection and identifies potential areas of concern observed during the inspection. Please note that omissions in the RCRA CEI report shall not be construed as a determination of compliance with any other applicable regulation.

The EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R. § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within fourteen (14) calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

The USEPA is also seeking additional information concerning operations at the facility. Please submit the following information:

1. Records (e.g. manifests, bills of lading, invoices, etc.) from any shipments of spent lead acid batteries (SLABs) from J Mascot Auto Parts for the past 5 years.
2. Please state whether J Mascot has ever played a role in the export of SLABs for any purpose, outside the United States. If so, please describe J Mascot's role in the export of SLABs.

Your response, due thirty (30) calendar days from the date of your receipt of this letter, shall be addressed to:

Jennifer MacArthur
Enforcement Division (ENF-2-2)
US Environmental Protection Agency Region 9
75 Hawthorne Street
San Francisco, CA 94105

In lieu of submitting your response by mail, you may submit the response as portable document file(s) via electronic mail to macarthur.jennifer@epa.gov.

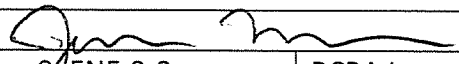
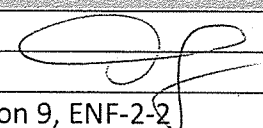

If you have any questions regarding this letter, please contact Jennifer MacArthur of my staff at (415) 972-3994.

Sincerely,



Douglas K. McDaniel
Chief, Waste and Chemical Section
Enforcement Division

**Region 9 Enforcement Division
75 Hawthorne Street
San Francisco, CA 94105
RCRA INSPECTION REPORT**

Inspection Date(s):	9/26/18		Inspection Announced: No
Time:	Entry: 10:45 a.m.		
Regulatory Program(s):	RCRA Subtitle C (Hazardous Waste)		
Facility Name	J Mascot Auto		
Facility/Site Location:	Malaeimi across from Ace Hardware		
(city, state, zip code)	Pago Pago, AS 96799		
Mailing Address	PO Box 1239		
(city, state, zip code)	Pago Pago, AS 96799		
Facility/Site Contact:	Pati Jennings	Owner	
	pekajennings@yahoo.com		
	(684) 699-0707		
Facility/Site Identifier:	ASR000048967		
Generator Status:	Very Small Quantity Generator (VSQG)		
Facility/Site Personnel Participating in Inspection:			
Robin Jennings, Mechanic			
Inspector(s):			
Jennifer MacArthur	{signature} 	{date} 11/14/18	
	US EPA Region 9, ENF-2-2	RCRA Inspector	
	macarthur.jennifer@epa.gov	(415) 972-3994	
Additional Persons Participating in Inspection:			
Ignosy Toeava	American Samoa EPA	Hazardous Waste Branch Chief	
Alema Seu	American Samoa EPA	Environmental Specialist	
Peer Review:			
Dan Fernandez	{signature} 	{date} 11/14/18	
	US EPA Region 9, ENF-2-2	RCRA Inspector (415) 972-3299	
Supervisor Review:			
Douglas McDaniel	{signature} 	{date} 11/14/18	
	Waste and Chemical Section	Chief	(415) 947-4106

SECTION I – INTRODUCTION

Purpose of the Inspection

The purpose of the inspection was to determine J Mascot Auto Parts' (J Mascot) compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, and the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268, 273, and 279.

Opening Conference



EPA Region 9 inspector Jennifer MacArthur accompanied by American Samoa Environmental Protection Agency (AS EPA) staff arrived at the J Mascot facility around 10:45 am on September 26, 2018 for a routine unannounced compliance evaluation inspection (CEI). We met with Robin Jennings at the opening conference. Robin is the owner's son and also works as a mechanic for J Mascot. I presented my credentials to Mr. Jennings and informed him that this was an EPA inspection to determine ASCC's compliance with RCRA regulations.

Facility/Site Description

J Mascot is an auto parts shop and also services vehicles in American Samoa. They have been in business for approximately five years and have four employees. Waste generated by J Mascot includes used oil and spent lead acid batteries (SLABs). Used oil is collected in 20 gallon lube cubes. AS EPA samples the used oil to verify that halogenated compounds are not present. The used oil is then cleaned at the American Samoa Power Authority facility before being burned for energy at StarKist Samoa. SLABs are stored onsite before being sent off-Island for recycling.

SECTION II – OBSERVATIONS

The following table describes areas of concern observed during the facility walkthrough:

NO.	OBSERVATION	PHOTOGRAPH	REGULATORY AREA OF CONCERN
1	The inspector observed SLABS being stored on wooden pallets on a concrete pad outside the office area. The concrete pad was covered by a roof. The batteries appeared to be mostly in good condition. The facility representative wasn't sure how long the batteries had been there. Some staining was visible on the concrete as well as a small amount of liquid which appeared to be from a leak in the roof.	 Photograph P9260048  Photograph P9260050	40 CFR § 266.80 Spent Lead Acid Batteries Being Reclaimed Since no shipping records were available it is difficult to determine if the SLABs are being speculatively accumulated.

Records Review

No records were available for review during the inspection since the owner was off-Island. A follow-up letter will be sent to request records related to SLABs for the past three years to ensure they are not being speculatively accumulated and/or being exported to another country without the proper consent.

Closing Conference

The inspectors conveyed preliminary inspection findings to the facility representative and concluded the inspection.